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March 9, 2001



Surface Transportation Board
Office of the Secretary
Case Control Unit
1925 K Street, NW
Washington, DC 20423-0001

RE: STB Ex Parte No. 582 (Sub No. 1) Oral Argument

Dear Secretary Williams:

Pursuant to the February 23, 2001 Surface Transportation Board Notice, I hereby request permission to participate on behalf of the American Public Transportation Association (APTA) in oral arguments in the matter of STB Ex Parte No. 582 (Sub No. 1). I will address the following points:

- STB should carefully consider the impacts of mergers on existing and future rail passenger services as a key factor in its determination on the merger itself. Any adverse impacts to rail passenger operations should be weighed, as a public policy issue, in the decision as to whether or not to approve any merger.
- If there are any existing or future rail passenger operations that will be adversely affected by a merger, STB should consider ways to mitigate the impacts of that merger on such operations by granting additional access rights in that corridor, or by granting rights to prospective new services.
- In its approval of railroad mergers, the STB should maintain a strong oversight role to protect the interests of rail passengers.

To address the above issues, I request fifteen (15) minutes speaking time. My full title is Chief Counsel and Vice President for Government Affairs, American Public Transportation Association.

Sincerely yours,

Daniel Duff
Chief Counsel and Vice President
for Government Affairs

DD/cbo

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